

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

ANDREW CORZO, SIA HENRY, ALEXANDER LEO-GUERRA, MICHAEL MAERLANDER, BRANDON PIYEVSKY, BENJAMIN SHUMATE, BRITTANY TATIANA WEAVER, and CAMERON WILLIAMS, individually and on behalf of all others similarly situated,

Plaintiffs,

v.

BROWN UNIVERSITY, CALIFORNIA INSTITUTE OF TECHNOLOGY, UNIVERSITY OF CHICAGO, THE TRUSTEES OF COLUMBIA UNIVERSITY IN THE CITY OF NEW YORK, CORNELL UNIVERSITY, TRUSTEES OF DARTMOUTH COLLEGE, DUKE UNIVERSITY, EMORY UNIVERSITY, GEORGETOWN UNIVERSITY, THE JOHNS HOPKINS UNIVERSITY, MASSACHUSETTS INSTITUTE OF TECHNOLOGY, NORTHWESTERN UNIVERSITY, UNIVERSITY OF NOTRE DAME DU LAC, THE TRUSTEES OF THE UNIVERSITY OF PENNSYLVANIA, WILLIAM MARSH RICE UNIVERSITY, VANDERBILT UNIVERSITY, and YALE UNIVERSITY,

Defendants.

Case No. 1:22-cv-00125

Judge Matthew F. Kennelly

**DECLARATION OF DAVID H. SUGGS IN SUPPORT OF DEFENDANTS' MOTION
TO COMPEL DISCOVERY FROM PLAINTIFFS**

David H. Suggs declares the following pursuant to 28 U.S.C. § 1746:

1. I have been admitted *pro hac vice* to practice before this Court, am a member in good standing of the bars of the State of New York and the State of Tennessee, and am an attorney in the law firm of White & Case LLP. I submit this declaration based on my personal knowledge and in support of Defendants' Motion to Compel Discovery from Plaintiffs and Defendants' Statement of Compliance Under Local Rule 37.2.

2. Exhibit 1 to the Memorandum in Support of Defendants' Motion to Compel Discovery from Plaintiffs is a true and correct copy of Defendants' First Set of Interrogatories to Plaintiffs, dated September 19, 2022.

3. Exhibit 3 to the Memorandum in Support of Defendants' Motion to Compel Discovery from Plaintiffs is a true and correct copy of Defendants' First Set of Requests for Production of Documents Directed to Plaintiffs, dated September 19, 2022.

4. Exhibit 4 to Defendants' Statement of Compliance Under Local Rule 37.2 is a true and correct copy of email correspondence between Defendants' counsel and Plaintiffs' counsel on the date printed at the top of the email communication.

5. Exhibit 5 to Defendants' Statement of Compliance Under Local Rule 37.2 is a true and correct copy of email correspondence between Defendants' counsel and Plaintiffs' counsel on the date printed at the top of the email communication.

6. Exhibit 6 to Defendants' Statement of Compliance Under Local Rule 37.2 is a true and correct copy of email correspondence between Defendants' counsel and Plaintiffs' counsel on the date printed at the top of the email communication.

7. Exhibit 7 to Defendants' Statement of Compliance Under Local Rule 37.2 is a true and correct copy of email correspondence between Defendants' counsel and Plaintiffs' counsel on the date printed at the top of the email communication.

8. Attendees at one or more of the conferences held on November 3, 2022, November 8, 2022, and December 6, 2022 included, but were not limited to: for Defendants, David Gringer, Leah Harrell, Benjamin Holt, Rucha Phadtare, David Suggs, Elizabeth Thompson, and Christopher Yook; and for Plaintiffs, Peter Bach-y-Rita, Robert Gilbert, Sarah Schuster, and Ted Normand.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: January 13, 2023 in Nashville, Tennessee

A handwritten signature in blue ink, appearing to read "D. Suggs", is written above a horizontal line.

David H. Suggs